

**IN THE UNITED STATES DISTRICT COURT
IN THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAMES BLOUNT,)	
individually and on behalf of the)	
class defined herein,)	
)	
Plaintiff,)	No. 08 C 2331
)	
v.)	Judge John W. Darrah
)	
MIDLAND CREDIT MANAGEMENT, INC.,)	
MIDLAND FUNDING NCC-2 CORP.,)	
and ENCORE CAPITAL GROUP, INC.,)	
)	
Defendants.)	

**AGREED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO PLAINTIFF'S CLASS ACTION COMPLAINT**

Defendants, Midland Credit Management, Inc. (“MCM”), Midland Funding NCC-2 Corporation (“Midland Funding NCC-2”), and Encore Capital Group, Inc. (“Encore”) (also collectively referred to as “Defendants”), by and through their attorneys, Dykema Gossett PLLC, move pursuant to Fed. R. Civ. P. 6(b), for an enlargement of time for Defendants to respond to Plaintiff’s Class Action Complaint (“Complaint”). In support of their agreed motion, Defendants state the following:

1. Plaintiff filed his Complaint on April 24, 2008.
2. Defendant MCM’s response to the Complaint is currently due on May 27, 2008; defendant Midland Funding NCC-2’s response to the Complaint is currently due on May 27, 2008; and defendant Encore’s response to the Complaint is currently due on May 29, 2008.
3. Counsel for Defendants was only recently retained and requires additional time to properly investigate the allegations and formulate an appropriate response.

4. On May 21, 2008, Defendants' counsel contacted counsel for Plaintiff who kindly agreed to an enlargement of time for Defendants to answer or otherwise plead to the Complaint up to and including June 25, 2008.

5. This request for an extension is not meant for the purposes of undue delay, and no party will be prejudiced by this extension.

WHEREFORE, Defendants request that this Court grant them an enlargement of time up to and including June 25, 2008, in which to respond to Plaintiff's Complaint, and grant such further and additional relief as this Court deems just and appropriate.

Dated: May 23, 2008

Respectfully submitted,

**MIDLAND FUNDING NCC-2 CORP.,
MIDLAND CREDIT MANAGEMENT, INC.,
and ENCORE CAPITAL GROUP, INC.**

By: s/ Theodore W. Seitz

Richard E. Gottlieb (rgottlieb@dykema.com)
Theodore W. Seitz (tseitz@dykema.com)
Kathleen E. Surowiec (ksurowiec@dykema.com)
DYKEMA GOSSETT PLLC
10 S. Wacker Drive, Suite 2300
Chicago, Illinois 60606
Phone: 312-876-1700
Fax: 312-627-2302

CERTIFICATE OF SERVICE

I hereby certify that on **May 23, 2008**, I electronically filed the foregoing **Agreed Motion for Enlargement of Time to Respond to Plaintiff's Class Action Complaint** with the Clerk of the Court using the ECF system, which sent notification to the following:

Daniel A. Edelman (courtecl@edcombs.com)
Cathleen M. Combs (ccombs@edcombs.com)
James O. Latturner (jlatturner@edcombs.com)
Cassandra P. Miller (cmiller@edcombs.com)

s/ Irina V. Frye _____

CHICAGO\2452575.1
ID\IVF